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March 23, 2021

MEMO ENDORSED

**By ECF Filing**

Hon. Colleen McMahon  
Chief Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

OK

Colleen M. McMahon  
3/25/2021

Re: United States v. Arthur Gipson  
Docket No. 20 Cr. 521 (SDNY)

Dear Judge McMahon:

I represent the defendant Arthur Gipson in the above-referenced matter. I write without objection from the Government to request a bail modification so as to allow Mr. Gipson to travel to Boston on April 3<sup>rd</sup> to visit his son, returning to his home on Long Island on April 5<sup>th</sup>.

At his presentment and arraignment on October 1, 2020, bail for Mr. Gipson was fixed in the amount of a \$250,000 PRB co-signed by one financially responsible person (Mr. Gipson's wife) and secured by his home, travel restricted to the EDNY and SDNY, pretrial services supervision and surrender of any travel documents, along with the usual conditions barring contact with co-defendants and possession of any firearms. All of these bail conditions have been satisfied and Mr. Gipson has been in full compliance with all of the conditions of his release.

Mr. and Mrs. Gipson would like to travel to Boston to visit their son, who resides in the Boston area. They propose to leave their home on Long Island on Saturday, April 3<sup>rd</sup> and return to their home on Monday, April 5<sup>th</sup>. While in Boston, Mr. and Mrs. Gipson will be staying at The Liberty Hotel, 215 Charles Street, Boston, MA.

Honorable Colleen McMahon

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March 23, 2021

AUSA Jason Swergold has advised me that the Government has no objection to the bail modification requested. Pretrial Services Officer Francesca Piperato has advised me that Pretrial Services has no objection to the bail modification requested.

Thank you for the Your Honor's consideration of this request.

Respectfully submitted,

/s/  
John F. Kaley

cc: AUSA Jason Swergold  
Pretrial Services Officer Francesca Piperato  
(both via ECF filing)